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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**KELSEY CASCADIA ROSE JULIANA;**  
**XIUHTEZCATL TONATIUH M.,** through his  
Guardian Tamara Roske-Martinez; et al.,

Plaintiffs,

v.

**The UNITED STATES OF AMERICA;**  
**DONALD TRUMP,** in his official capacity as  
President of the United States; et al.,

Defendants.

Case No.: 6:15-cv-01517-TC

**DECLARATION OF DR. STEVEN W.**  
**RUNNING in Support of Plaintiffs'**  
**Response in Opposition to Defendants'**  
**Motion for Summary Judgment**

**Declaration of Dr. Steven W. Running in Support of Plaintiffs' Response in Opposition to Defendants' Motion for Summary Judgment**

I, Dr. Steven W. Running, hereby declare and if called upon would testify as follows:

1. I have been retained as an expert on behalf of Plaintiffs in this matter.
2. I have prepared an expert report for this litigation ("Expert Report"), a true and correct copy of which is attached hereto as **Exhibit 1**. My Expert Report is signed by me. A copy of my Expert Report was served on Defendants on April 6, 2018.
3. My Expert Report contains:
  - a. a complete statement of all opinions I will express at trial and the basis and reasons for these opinions;
  - b. the facts or data considered by me in forming my opinions;
  - c. any exhibits that I currently plan to use to summarize or support my opinions;
  - d. my qualifications, including a list of all publications authored by me in the previous 10 years;
  - e. a list of all other cases in which, during the previous 4 years, I testified as an expert at trial or by deposition, if any; and
  - f. a statement of the compensation to be paid for the study and testimony in the case.
4. If called to testify in this matter, I would provide testimony as described in the attached Expert Report.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this \_\_\_\_ day of June, 2018.

Respectfully submitted,



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Dr. Steven W. Running